

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Mark Robert Woodring
Debtor 1

Cardinal Financial Company, LP
Movant(s)

v.

Mark Robert Woodring
Lisa K. Woodring (Non-Filing Co-Debtor)

Respondent(s)

Jack N. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
Additional Respondent

Chapter 13

Case No. 1:22-BK-01409-HWV

Matter: Motion for Relief from the Automatic Stay

Document No. 29

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Mark Robert Woodring, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.

2. Admitted.

3. Admitted.

4. Upon information and belief, the averments as stated in Paragraph 4 are admitted.

5. Admitted.

6. Denied. As indicated in the confirmed Plan, Respondent(s)' monthly mortgage payment are part of the monthly payment to the Standing Chapter 13 Trustee. By way of further response, since confirmation of the First Amended Plan on November 11, 2022, the Standing Chapter 13 Trustee's office has remitted several payments to Movant(s). The total amount remitted as of the date of Movant(s)' Motion for Relief from the Automatic Stay is \$3,155.44.

7. Denied. As indicated in the confirmed Plan, Respondent(s)' monthly mortgage payment are part of the monthly payment to the Standing Chapter 13 Trustee. By way of further response, since confirmation of the First Amended Plan on November 11, 2022, the Standing Chapter 13 Trustee's office has remitted several payments to Movant(s). The total amount remitted as of the date of the filing of Movant(s)' Motion for Relief from the Automatic Stay is \$3,155.44.

8. Paragraph 8 contains a conclusion of law to which no response is required.

9. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averments as stated in Paragraph 9; therefore, they are strictly denied.

10. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 10; therefore, they are strictly denied.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,
DETHLEFS PYKOSH & MURPHY

Date: January 17, 2023

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
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Attorney for Debtor(s)

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CERTIFICATE OF SERVICE

I hereby certify that on Tuesday, January 17, 2023, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

Denise Carlon, Esquire
KML Law Group, PC
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532
Counsel for Movant(s)

Jack H. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Office of the United States Trustee
Ronald Reagan Federal Building
228 Walnut Street, Room 1190
Harrisburg, PA 17101

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire